UNITED STATES DISTRICT COURT EASTERN DISTRICT OF LOUISIANA



BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS

UNITED STATES OF AMERICA

v.

CRIMINAL DOCKET NO.

SECTION:

EVA BAPTISTE

VIOLATION: 18 U.S.C. §641

a/k/a Eva Camese a/k/a Eva Baptiste Camese

The United States Attorney charges that:

Count 1

AT ALL MATERIAL TIMES HEREIN: A.

- 1. Prior to August and September of 2005 and through the present, the defendant, EVA BAPTISTE, a/k/a Eva Camese, a/k/a Eva Baptiste Camese, resided at and used as her primary residence a home located at 3301 North Roman Street, New Orleans, Louisiana 70117, in the Eastern District of Louisiana.
- 2. Prior to August and September 2005, the defendant, EVA BAPTISTE, a/k/a Eva Camese, a/k/a Eva Baptiste Camese, owned a single family residence located at 1525 Lesseps

Street, New Orleans, Louisiana 70117, in the Eastern District of Louisiana, which she rented and did not occupy.

- 3. Hurricane Katrina made landfall in Louisiana on August 29, 2005, and caused widespread damage to the Gulf Coast region of Louisiana, including the New Orleans area.
- 4. Pursuant to legislation passed by the Congress of the United States of America and signed by the President of the United States, funds were appropriated to the Department of Housing and Urban Development ("HUD") for a Community Development Block Grant ("CDBG") for Louisiana hurricane victims. The purpose of this CDBG was to assist and aid owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September of 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program ("LRHP"). HUD prepared the rules and regulations governing the disbursement of grant money through the State of Louisiana. The State of Louisiana, through the Office of Community Development, Division of Administration, contracted with ICF International, Inc. to administer the LRHP.
- 5. One of the major requirements for receiving grant money from the LRHP was the damaged property must have been the primary residence of the applicant on August 29, 2005.

B. THE OFFENSE OF THEFT OF GOVERNMENT FUNDS

6. From on or about July 1, 2007, to on or about June 30, 2008, in the Eastern District of Louisiana, the defendant, EVA BAPTISTE, a/k/a Eva Camese, a/k/a Eva Baptiste Camese, did knowingly steal, purloin, and convert for her own use funds and money of the United States Department of Housing and Urban Development, a department and agency of the United States, namely, Community Development Block Grant funds provided through the Louisiana Road Home

Program to which she knew she was not entitled, having a value of approximately \$110,420.00; all in violation of Title 18, United States Code, Section 641.

JIM LETTEN/

United States Attorney

Bar Roll No. 8517

JAN MASELLI MANN

First Assistant United States Attorney

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MATTHEW S. CHESTER

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New Orleans, Louisiana January 23, 2009